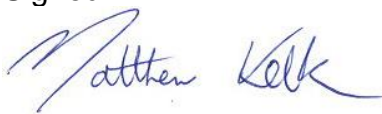


OMA Report – Emissions to Air - EPR

Summary sheet		
Permit Number: WP3836ZF		Compliance Officer: Matthew Kelk
Operator: Tradebe Healthcare National Ltd, Wrexham Clinical Waste Incinerator		Auditor (if different):
Emission Point(s):		Others Present:
OMA Sections		SCORE
OMA 1 – Management of monitoring		92%
OMA 2 – Periodic monitoring and test laboratories		98%
OMA 3 – Continuous monitoring		100%
OMA 4 – Quality assurance		80%
		OVERALL SCORE 93%
OVERALL SITE ASSESSMENT COMMENTS		Letter
		Variation
		Enforcement
<p>OMA focused on the periodic and CEMS monitoring from stack A1 at the Wrexham Clinical Waste Incinerator.</p> <p>Tradebe have shown that there is a high level of control over periodic and CEMS monitoring data. A high score of 93% was achieved during the audit.</p> <p>A few minor observations were noted to be taken into account for potential improvement.</p>		
		Date of audit:14/09/2018
		Signed: 
		Date:19/10/2018

OMA 1: Management of monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Documentation of management system procedures for monitoring	5	A comprehensive EMS procedure THC 121 'Incinerator Environmental Monitoring Responsibilities' covers each member of staff's responsibilities with regards to monitoring. The document is fully controlled and is available to all relevant staff. Procedure is up to date with the last version approved on 17/08/2018. A site specific protocol (SSP) is sent from the monitoring contractor and reviewed by the operator for each monitoring round.
B. Organisational structure for monitoring	5	An organogram showing the management structure on site was presented during the audit. The structure for monitoring is clearly defined. Provision for deputy is built into the structure. The organogram is linked to the clearly defined roles and responsibilities procedure THC 121.
C. Schedules and planning of monitoring, including contingencies	4	Monitoring is booked out in a monthly plan. Constant dialogue between Exova (monitoring contractor) and Tradebe. SSP is sent in good time before monitoring. Contract is held with SICK (CEMS provider) as to when calibration and maintenance of CEMS is due. Discussed onsite when the AST and QAL 2 where required.
D. Monitoring records and use of monitoring data	5	Clear evidence that the data is reviewed. Data is reviewed daily by plant manager annotated with any issues and shutdowns and then signed off. CEMS data is displayed within the plant in a visible location. Tradebe set their own alarm trigger limits which are well below the permitted ELV's. Data is reviewed at the end of the month during discussion with SHEQ manager.
E. Understanding the requirements of the permit and monitoring methods	4	The operator is very knowledgeable about the permit and the monitoring requirements. CEMS training has been provided by SICK. MCS100FT instrument training trained out at supervisor level. Toolbox talks for THC 121, training logs shown.

OMA 1 – SCORE	23/25 92%	
SUMMARY COMMENTS FOR OMA 1		
<p>OMA 1E - it would be beneficial for key members of staff to attend additional monitoring training:-</p> <p>The Source Testing Association holds the following courses:-</p> <ul style="list-style-type: none">- Regulatory Monitoring Requirements for Process Operators,- BS EN1481 Quality Assurance of an AMS (covering CEMS and parallel testing.)		

OMA 2: Periodic monitoring and test laboratories		
OMA ELEMENTS	SCORE	COMMENTS
A. Sampling provisions <i>Critical Element</i>	4	Current sampling provisions allow representative air monitoring. Sampling platform is slightly smaller than required by EA TGN M1 standards, but does allow Exova to take samples from all planes.
B. Certification of equipment	5	All instrumentation used by Exova are MCERTS accredited, certificates shown online for equipment.
C. Measurement methods and standards <i>Critical element</i>	5	All standards used by Exova meet those that are stipulated by TGN M2.
D. Calibration methods <i>Critical element</i>	5	Gaseous analysers are calibrated when they come to site. MCERTS accreditation for all measured determinants.
E. Frequency of maintenance and calibration	5	All equipment used for periodic monitoring is MCERTS/UKAS certified. Calibration certificates were shown for the PROTIR 204FTIR and HORIBA PG 250 and both are calibrated until 09/01/2019 and 14/05/2019 respectively.
F. Reliability of equipment (data availability)	5	Monitoring contractor equipment very reliable, repeat samples rare. Exova carry spares. Staff are responsible for their own equipment and this allows for better maintenance.
G. Breakdown response	5	Spare instruments are available and could be onsite within an hour if there was a breakdown.
H. Traceability	5	MCERTS accredited monitoring contractor used, certificate provided for lab certification.
OMA 2 – SCORE	39/40 98%	
SUMMARY COMMENTS FOR OMA 2		

OMA 3: Continuous monitoring		
OMA ELEMENTS	SCORE	COMMENTS
A. Provisions for monitoring and location of CEMs <i>Critical Element</i>	5	Sampling facilities for CEMS meets requirements of EA M1 for sampling gaseous emissions.
B. Certification of CEMs	5	MCERTS certificates shown for all CEMS analysers on site, certificate issued on 23/08/2018. SIRA MC080130/03 MCERTS certification for envirosoft software.
C. Calibration methods <i>Critical element</i>	5	Commissioning shown for initial setup of CEMS equipment. Verified with calibration gases using QAL2. Operator carrying out regular QAL3 analysis, these reports were shown during the audit, QAL3 13/08/2018. Zero and span checks shown for all measured pollutants. Calibration functions shown from QAL2 reports, NRW were shown how this was inserted into the envirosoft software package. Control charts shown to calibrate from QAL3.
D. Frequency of maintenance and calibration	5	CEMS are maintained by SICK on a maintenance contract. Documentary evidence of this contract was shown. PPM details the frequency of the CEMS calibration. QAL3 monthly, QAL2 annual moving forward.
E. Reliability of equipment (data availability)	5	CEMS only recently installed, valid results are available 100% of time currently.
F. Breakdown response	5	24 hour response from SICK (CEMS provider). SICK can also dial into site remotely.
G. Traceability	5	Fully documented traceability, QAL2 and QAL3 reports shown on site. Calibration gases on site are fully traceable to international standards.
OMA 3 – SCORE	35/35 100%	
SUMMARY COMMENTS FOR OMA 3		

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OMA 4: Quality assurance		
OMA ELEMENTS	SCORE	COMMENTS
A. External quality control schemes	5	Exova are MCERTS accredited, certificates checked. Exova carry out inter lab proficiency testing schemes. Samples sent to labs off site: Metals RPS, Dioxins/PCB's Marchwood and PAH's SAL, all labs UKAS/MCERTS accredited
B. Internal data quality control	5	Data quality auditing is tied into EMS procedure THC 121. Data QC is carried out by plant manager. Data is not capped by system.
C. Competence of monitoring personnel	5	Exova staff attending site are accredited MCERTS level 1 and level 2. Site staff have undertaken recent training into CEMS software and CEMS instrumentation.
D. Auditing of monitoring	3	It is clear that auditing of SSP, monitoring data and monitoring carried out on site by Exova is undertaken by Site manager. Appears to be no auditing procedures or tickbox sheets
E. Audit compliance	1	No audit records are available, see recommendation below.
F. Reporting	5	Submitted monitoring reports to NRW meet requirements of permit. Exova monitoring reports provided during audit.
OMA 4 – SCORE	24/30 80%	
SUMMARY COMMENTS FOR OMA 4		
<p>OMA 4D & 4E</p> <p>Whilst onsite auditing of monitoring contractors does occur, procedures and documented evidence needs to be provided to show that EMS procedures and onsite monitoring protocols such as the SSP are being followed in an auditable trail.</p>		